

*Counsel for Plaintiffs and Defendants
Listed on Signature Page*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

GRANT HOUSE, *et al.*,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, *et al.*,

Defendants.

No. 4:20-cv-03919 CW

CLASS ACTION

**[PROPOSED] JOINT STIPULATED
CASE MANAGEMENT ORDER**

Hon. Claudia Wilken

TYMIR OLIVER, *et al.*,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, *et al.*,

Defendants.

No. 4:20-cv-04527 CW

CLASS ACTION

Pursuant to the Court's directions at the November 18, 2020 Case Management Conference and the Court's November 18, 2020 Minute Order (*House* ECF No. 123 and *Oliver* ECF No. 90), counsel for Plaintiffs Grant House, Sedona Prince, and Tymir Oliver ("Plaintiffs") and Defendants National Collegiate Athletic Association, Pac-12 Conference, The Big Ten Conference, Inc., The Big 12 Conference, Inc., Southeastern Conference, and Atlantic Coast Conference ("Defendants," and collectively with Plaintiffs, "the Parties") in the above-referenced actions submit this Joint Stipulated Case Management Order.

EVENT	DATE
Commencement of document discovery	Nov. 19, 2020
Non-document fact discovery may commence	After decision on pending motion to dismiss
Parties to submit to Court, Stipulated Order re Discovery of Electronically Stored Information and Stipulated Protective Order, <i>or</i> submit to Court for resolution all outstanding disputes regarding these otherwise stipulated proposed orders	Dec. 11, 2020
Deadline for Plaintiffs to add additional parties or claims, or amend complaint (including the filing of any consolidated complaint)	Jan. 4, 2021 ¹
Defendants' Answer	Feb. 8, 2021
Substantial Completion of Production of Documents by Parties	June 1, 2021 ²
Class Certification Motion and Supporting Expert Reports	Nov. 22, 2021
Deadline to Depose Plaintiffs' Class Experts	Jan. 31, 2022
Class Certification Opposition and Supporting Expert Reports	Feb. 28, 2022
Deadline to Depose Defendants' Class Experts	Mar. 28, 2022
Class Certification Reply and Expert Rebuttal Report	May 2, 2022
Deadline for Supplemental Depositions of Plaintiffs' Class Experts	No supplemental depositions shall be permitted without

¹ This deadline and the deadline for Defendants' Answer are based on the assumption that the Court will issue its order on Defendants' Motion to Dismiss by December 1, 2020.

² The Parties will make rolling productions as soon as documents are ready to be produced. The Parties also agree to meet and confer in good faith about the timing and scope of productions.

	agreement of the parties or leave of the Court
Hearing on Class Certification	May 31, 2022
Merits Discovery Cut Off	Aug. 11, 2022
Merits Experts Disclosure (including reports) on issues as to which Party bears the burden at trial	Sept. 15, 2022
Merits Expert Response	Nov. 10, 2022
Merits Expert Reply	Dec. 8, 2022
Expert Discovery Cut-Off	Jan. 12, 2023
Plaintiffs' dispositive motion and <i>Daubert</i> motions	Feb. 16, 2023
Defendants' (1) opposition to Plaintiffs' dispositive motion and <i>Daubert</i> motions and (2) dispositive motion and <i>Daubert</i> motions	March 30, 2023
Plaintiffs' (1) reply in support of their dispositive motion and <i>Daubert</i> motions and (2) opposition to Defendants' dispositive motion and <i>Daubert</i> motions	May 11, 2023
Defendants' reply in support of their dispositive motion and <i>Daubert</i> motions	June 8, 2023
Hearing on all dispositive and <i>Daubert</i> motions and further case management conference	July 26, 2023
Trial Date	October 9, 2023

1 DATED: December 1, 2020

HAGENS BERMAN SOBOL SHAPIRO LLP

2 By: /s/ Steve W. Berman
3 STEVE W. BERMAN

4 Steve W. Berman (*pro hac vice*)
5 Emilee N. Sisco (*pro hac vice*)
6 1301 Second Avenue, Suite 2000
7 Seattle, WA 98101
8 Telephone: (206) 623-7292
9 Facsimile: (206) 623-0594
10 steve@hbsslaw.com
11 emilees@hbsslaw.com

12 Benjamin J. Siegel (SBN 256260)
13 HAGENS BERMAN SOBOL SHAPIRO LLP
14 715 Hearst Avenue, Suite 202
15 Berkeley, CA 94710
16 Telephone: (510) 725-3000
17 Facsimile: (510) 725-3001
18 bens@hbsslaw.com

1 DATED: December 1, 2020

SPECTOR ROSEMAN KODROFF & WILLS, PC

2
3 By: /s/ Jeffrey L. Kodroff
4 JEFFREY L. KODROFF

5 Jeffrey L. Kodroff (*pro hac vice*)
6 Eugene A. Spector (*pro hac vice*)
7 SPECTOR ROSEMAN KODROFF & WILLS, PC
8 2001 Market Street, Suite 3420
9 Philadelphia, PA 19103
10 Telephone: (215) 496-0300
11 Facsimile: (215) 496-6611
12 jkodroff@srkattorneys.com
13 espector@srkattorneys.com

14 *Counsel for Plaintiffs and the Proposed Classes*

1 DATED: December 1, 2020

2 **WILKINSON STEKLOFF LLP**

3
4 By: /s/ Beth A. Wilkinson
BETH A. WILKINSON

5 Beth A. Wilkinson (*pro hac vice*)
6 Rakesh N. Kilaru (*pro hac vice*)
7 Tamarra Matthews Johnson (*pro hac vice*)
8 Kieran Gostin (*pro hac vice*)
9 Calanthe A. Cope-Kasten (*pro hac vice*)
10 WILKINSON STEKLOFF LLP
2001 M Street NW, 10th Floor
Washington, D.C. 20036
Telephone: (202) 847-4000
Facsimile: (202) 847-4005
11 bwilkinson@wilkinsonstekloff.com
rkilaru@wilkinsonstekloff.com
12 tmatthewsjohnson@wilkinsonstekloff.com
kgostin@wilkinsonstekloff.com
13 cope-kasten@wilkinsonstekloff.com

14
15 Rahul Hari (SBN 313528)
WILKINSON STEKLOFF LLP
16 11601 Wilshire Blvd., Suite 600
Los Angeles, CA 90025
17 Telephone: (424) 291-9655
Facsimile: (202) 847-4005
18 rhari@wilkinsonstekloff.com

19 *Attorneys for Defendant National Collegiate Athletic*
20 *Association*

1 DATED: December 1, 2020

PROSKAUER ROSE LLP

2
3 By: /s/ Scott P. Cooper
4 SCOTT P. COOPER

5 Bart H. Williams (SBN 134009)
6 Scott P. Cooper (SBN 96905)
7 Kyle A. Casazza (SBN 254061)
8 Jennifer L. Jones (SBN 284624)
9 Shawn S. Ledingham, Jr. (SBN 275268)
10 PROSKAUER ROSE LLP
11 2029 Century Park East, Suite 2400
12 Los Angeles, CA 90067
13 Telephone: (310) 557-2900
14 Facsimile: (310) 557-2193
15 bwilliams@proskauer.com
16 scooper@proskauer.com
17 kcasazza@proskauer.com
18 jljones@proskauer.com
19 sledingham@proskauer.com

20 *Attorneys for Defendant Pac-12 Conference*

1 DATED: December 1, 2020

MAYER BROWN LLP

2
3
4 By: /s/ Britt M. Miller
BRITT M. MILLER

5 Britt M. Miller (*pro hac vice*)
6 Matthew D. Provance (*pro hac vice*)
MAYER BROWN LLP
7 71 South Wacker Drive
8 Chicago, IL 60606
9 Telephone: (312) 782-0600
Facsimile: (312) 701-7711
bmiller@mayerbrown.com
10 mprovance@mayerbrown.com

11 Christopher J. Kelly (SBN 276312)
MAYER BROWN LLP
12 Two Palo Alto Square, Suite 300
13 3000 El Camino Real
Palo Alto, CA 94306
14 Telephone: (650) 331-2000
Facsimile: (650) 331-2060
15 cjkelly@mayerbrown.com

16 *Attorneys for Defendant The Big Ten Conference, Inc.*
17
18
19
20
21
22
23
24
25
26
27
28

1 DATED: December 1, 2020

ROBINSON BRADSHAW & HINSON, P.A.

2
3
4 By: /s/ Robert W. Fuller
ROBERT W. FULLER

5 Robert W. Fuller, III (*pro hac vice*)
6 Lawrence C. Moore, III (*pro hac vice*)
7 Pearlynn G. Houck (*pro hac vice*)
8 Amanda P. Nitto (*pro hac vice*)
9 ROBINSON BRADSHAW & HINSON
10 101 North Tryon Street, Suite 1900
11 Charlotte, NC 28246
12 Telephone: (704) 377-2536
Facsimile: (704) 378-4000
rfuller@robinsonbradshaw.com
lmoore@robinsonbradshaw.com
phouck@robinsonbradshaw.com
apickens@robinsonbradshaw.com

13 Mark J. Seifert (SBN 217054)
14 Seifert Law Firm
15 50 California Street, Suite 1500
16 San Francisco, CA 94111
17 Telephone: (415) 999-0901
Facsimile: (415) 901-1123
mseifert@seifertfirm.com

18 *Attorneys for Defendant Southeastern Conference*
19
20
21
22
23
24
25
26
27
28

1 DATED: December 1, 2020

FOX ROTHSCHILD LLP

2
3 By: /s/ D. Erik Albright
D. ERIK ALBRIGHT

4
5 D. Erik Albright (*pro hac vice*)
Gregory G. Holland (*pro hac vice*)
6 FOX ROTHSCHILD LLP
230 North Elm Street, Suite 1200
7 Greensboro, NC 27401
Telephone: (336) 378-5368
8 Facsimile: (336) 378-5400
ealbright@foxrothschild.com
9 gholland@foxrothschild.com

10 Jonathan P. Heyl (*pro hac vice*)
11 FOX ROTHSCHILD LLP
101 N. Tryon Street, Suite 1300
12 Charlotte, NC 28246
Telephone: (704) 384-2625
13 Facsimile: (704) 384-2800
jhey1@foxrothschild.com

14
15 Alexander Hernaez (SBN 201441)
FOX ROTHSCHILD LLP
16 345 California Street, Suite 2200
San Francisco, CA 94104
17 Telephone: (415) 364-5540
18 Facsimile: (415) 391-4436
ahernaez@foxrothschild.com

19
20 *Attorneys for Defendant Atlantic Coast Conference*

1 DATED: December 1, 2020

POLSINELLI, PC

2
3 By: /s/ Leane K. Capps
4 LEANE K. CAPPS

5 Leane K. Capps (*pro hac vice*)
6 Caitlin J. Morgan (*pro hac vice*)
7 D. Rockwell Bower (*pro hac vice*)
8 POLSINELLI, PC
9 2950 N. Harwood Street, Suite 2100
10 Dallas, TX 75201
11 Telephone: (214) 397-0030
12 lcapps@polsinelli.com
13 cmorgan@polsinelli.com
14 rbower@polsinelli.com

15 Amy Dawn Fitts (*pro hac vice*)
16 POLSINELLI, PC
17 120 W. 12th Street
18 Kansas City, MO 64105
19 Telephone: (816) 218-1255
20 afitts@polsinelli.com

21 Wesley D. Hurst (SBN 127564)
22 POLSINELLI, PC
23 2049 Century Park East, Suite 2300
24 Los Angeles, CA 90067
25 Telephone: (310) 556-1801
26 whurst@polsinelli.com

27 *Attorneys for Defendant The Big 12 Conference, Inc.*
28

E-FILING ATTESTATION

I, Steve Berman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Steve W. Berman
STEVE W. BERMAN

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

THE HONORABLE CLAUDIA WILKEN
United States District Court Judge